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R. PAUL BEVERIDGE

Richard McAllister Office of Regional Counsel United States Environmental Protection Agency 1200 Sixth Avenue Region 10 Seattle, Washington 98101

Dear Mr. McAllister:

Please find enclosed the Hylebos Group's list of additional PRPs for the Hylebos Waterway including the original cover letter from Fred Wolf and Konrad Liegel on behalf of the Group. the Group appreciates EPA's efforts to identify additional PRPs. As discussed in our meeting of March 25, identifying as many PRPs as possible should help promote a fair and expeditious settlement of the Commencement Bay cleanup.

As you will note, most of the additional PRPs on the enclosed list are compiled from the responses to EPA's initial 104(e) request. The Group tried to provide descriptive information on the additional PRPs where possible. difficult for the Group to provide further information regarding these PRPs without resort to formal discovery during litigation. Perhaps the most efficient method to obtain further information on these additional parties would be to send 104(e) requests for information to them.

Please do not hesitate to call if I can be of further assistance.

Very truly yours

R. Paul Beveridge

RPB:ch enclosure C0330.2

cc: Alison Hiltner

February 4, 1992

Ms. Lori Cohen
U.S. Environmental Protection Agency
Region X - Superfund Branch
1200 Sixth Avenue
HW-113
Seattle, Washington 98101

Re: Comprehensive List of PRPs for the Commencement Bay Nearshore/Tideflats Superfund Site

Dear Ms. Cohen:

This letter is sent to you on behalf of the Hylebos PRP Group. The Hylebos PRP Group currently consists of over 25 companies included on EPA's list of "potentially responsible parties" attached to EPA's April 24, 1989 letter to PRPs.

During the Hylebos PRP Group's meeting on January 30, 1992 the group requested that as a member of the Steering Committee I send you this letter and the attached lists of additional PRPs. The attached lists show PRPs not included on EPA's current comprehensive list of PRPs (several of these lists were sent to you in 1989). Most of the additional PRPs noted were identified in the 104(e) response letters from Hylebos PRPs.

We request that EPA include the additional PRPs listed here on EPA'slist of PRPs for the Hylebos waterway. We request that EPA issue letters equivalent to EPA's April 24, 1989 letter to the additional PRPs and that, if possible, EPA encourage these PRPs to participate in the Hylebos PRP Group. If you have any questions please call me at 623-7580.

Very truly yours,

Fred Wolf and Konrad Liegel, Atochem Steering Committee Member

Hylebos PRP Group

Enclosure : cc: Hylebos

cc: Hylebos PRP Group - members mailing list

Additional PRPs for EPA's PRP List for surface water discharges

Name and Address	Probable Status
ASARCO P.O. Box 1617 Tacoma, WA 98421	Surface water runoff of arsenic, copper, lead, and zinc from ASARCO smelter slag used as ballast in log sorting yards along the Hylebos Waterway
Woodworth & Co.	Wastewater from gravel pit above Hylebos Waterway drains to waterway through Morningside Ditch.
Washington State Department of Transportation	Runoff from Interstate 5 drains to Hylebos Waterway.
Pierce County	Storm drainage from areas under Pierce County's jurisdiction within Hylebos Creek drainage basin.
City of Fife	Storm drainage from areas under Fife's jurisdiction within Hylebos Creek drainage basin.
Town of Milton	Storm drainage from areas under Milton's jurisdiction within Hylebos Creek drainage basin.
King County	Storm drainage from areas under King County's jurisdiction within Hylebos Creek drainage basin.

Additional PRPs for EPA's PRP List* for property owned/leased by

AK-WA shipbuilding 401 Alexander, Tacoma WA

Name and Address	Probable Status
Coast Engines	Prior owner
Kiewit Construction	Prior owner
Marine Industries	Prior owner
Pacific Marine Repair	Prior owner
Todd's Pacific Shipyard	Prior owner
Zidell Marine	Prior owner

^{*}Source: Identified in PRP response to 104(e) letter.

Additional PRPs for EPA's PRP List* for property owned/leased by

AOL Express

(Gateway Consolidators Inc. until 1988) 2000 Taylor Way, Tacoma, WA

Name	Probable Status
Steamers Service Company	Ownership interest (1969-1975)
E. F. Hausman Company	Ownership interest (1969-1971)
Educators Manufacturing Company	Ownership interest (1969)
Mutual Fir Column Company	Ownership interest (1971-1982)
W.W.B. Inc.	Ownership interest (1972)
Rothschild Washington Stevedoring Company	Ownership interest (1975-1981)
(b) (6)	Ownership interest (1981-1982)
Lindal Cedar Homes Walter Lindal 4300 S. 104th Pl. Seattle, WA 98124	Took over Mutual Fir Column c/o Company's interest in the mid- 1970s until September 15, 1982

^{*}Source: Identified in PRP response to 104(e; letter.

Additional PRPs for EPA's PRP List* for property owned/leased by

Atochem North America 3009 Taylor Way, Tacoma, WA

HYLEBOS WATERWAY

Name and Address

Probable Status

West Coast Lumber Operation Company (subsidiary of Mitsui Co.) 4215 East West Road Tacoma, WA 98421 Ownership interest d/b/a West Coast Orient/Portac; leased to Dunlap 1979-1983

Echo Lumber Company (log chipping and processing) 5326 184th Street Tacoma, WA 98446 Attn: Harry Proud Tenant (1984-1986)

Goodwin-Johnson Ltd.
(log-sort operation)
P.O. Box 82217
North Burnaby, B.C. V5C 5P7

Tenant (1967-1977)

Balfour Guthrie & Co., Ltd. (log-sort operation)

Tenant (1964-1966)

Milwaukee Boom Company (subsequently merged w/ Foss Tug & Barge Co.)

Ownership interest until 1957

^{*}Source: Identified in PRP response to 104(e) letter.

Additional PRPs for EPA's PRP List for property owned/leased by

Chemical Processors, Inc.

1501 Taylor Way/1629 Alexander Avenue/1701 Alexander Avenue, Tacoma, WA

HYLEBOS WATERWAY

APPROX. DATE	PROBABLE OWNER	STATUS OPER.	NAME	COMMENTS
1937	x		Mutual Fir Column Co.	Located SE of Chempro property. Waste by-products (inc. methymercuric phosphate waste) then pumped to large shallow bog north and west of Mutual Fir plant. Bog is assumed to have extended onto property now owned by Chempro.

Sources: Identified in PRP response to 104(e) letter.

Dame's & Moore, 1982. Historic Land Use Survey of the Tacoma Tideflats. Prepared for Washington Department of Ecology, Olympia, Washington.

Maps of Tacoma, WA (publishers unknown): 1937, 1941, 1951

Remediation Technologies, Inc. (ReTec), 1987. Site Operations History: Parcel A and Neighboring Parcels, Chemical Processors, Inc., Tacoma, Washington. Privileged and confidential attorney work product. Prepared for Ralph Palumbo, P.S.: Heller, Ehrman, White & McAuliffe Attorneys.

Tetra Tech, 1985. Commencement Bay Nearshore/Tideflats Remedial Investigation, Vol. 2. Prepared for EPA and WDOE.

U.S. EPA, 1985. Potential Hazardous Waste Site Preliminary Assessment, Summary Memorandum: Don Oline Landfill, 1801 Alexander Ave., Tacoma, WA.

APPROX. <u>DATE</u>	PROBABLE STATUS OWNER OPER.	NAME	COMMENTS
			Mutual Fir property was occupied by Lindal Cedar Homes, Inc. (1970s), and AOL Express (1980s-present).
1941~?	. x	Rayonier, Inc. T. Johnson	
1951~?	x x	City of Tacoma Tacoma Powdered Metals Co., Inc. Johnson & We?	
1970s (or earlier - 1980)	x	Don Oline	Allowed fill and dumping of industrial waste and fill material on site, known as "Oline's Landfill." Included Hooker Chemical Company sludge (1972-1975) containing heavy metals and asbestos.
1970s?		Continental Lime	Formerly Domtar Lime, located across Alexander Avenue SW of Chempro. Deposited waste lime on site as fill.
1970?- 1074?		General Metals of Tacoma, Inc.	Source of auto fluff deposited on site as fill.
197 2?- 1975?		Occidental Chemical & Plastic Corp. (formerly Hooker Chemical)	Waste sludge and dredge spoil disposal on site, in. mat'ls with chlorinated hydrocarbons, heavy metals and asbestos.

APPROX. DATE	PROBABLE STATUS OWNER OPER.	NAME	COMMENTS
1980-1982	x	(b) (6)	Owners, based in Vallejo, CA.
1982	×	Chemical Processors, Inc.	Purchased south parcel
?-1985	x	Freeway Container Corp.	Shipping and container storage; leased north and part of south parcels.
1988	×	Glacier Park Co.	Purchased 53% of Chemical Processors, Inc.
1988	x	Burlington Environmental, Inc.	Acquired 100% ownership of Chemical Processors, Inc. Burlington Environmental, Inc. owned by Glacier Park Co. (53%) and David Sabey (47%).

Additional PRPs for EPA's PRP List* for property owned/leased by

Buffelen Woodworking Company 1901 Taylor Way/Lincoln Ave & Taylor Way/3401 Lincoln Ave Tacoma WA

Name	Probable Status
Hauserman Inc. Educators Division	Ownership interest until 1972
Mutual Fir Column Co.	Ownership interest until 1965; company no longer in business
Commencement Bay Log & Storage	Ownership interest until 1967; continued to lease property until 1972

^{*}Source: Identified in PRP response to 104(e) letter.

Additional PRPs for EPA's PRP List* for property owned/leased by

Cenex Agriculture, Inc. 1801 Taylor Way, Tacoma WA

<u>Name</u>	Probable Status
Ryder Truck Rentals P.O. Box 58128 Tukwila, WA 98138	Tenant (1987-present)
Land O'Lakes/ Cenex Feed, Inc. 1801 Taylor Way Tacoma, WA 98421	Tenant (1987-present)
Sea Lite Products 2833 N.W. 72nd Seattle, WA 98107	Tenant (1985)
Ballard Seafood, Inc. 2313 1/2 N.W. Market Street Seattle, WA 98107	Tenant (1984)
Mermaid Industries (b)(6) address unknown	Tenant (1982-1984)
Western Farmers Association	Ownership interest (1946-1982)

^{*}Source: Identified in PRP response to 104(e) letter.

Additional PRPs for EPA's PRP List for property owned/leased by

Chemical Processors, Inc.

1501 Taylor Way/1629 Alexander Avenue/1701 Alexander Avenue, Tacoma, WA

HYLEBOS WATERWAY

APPROX. DATE	PROBABLE STATUS OWNER OPER.	<u>NAME</u>	COMMENTS
1937	x	Mutual Fir Column Co.	Located SE of Chempro property. Waste by-products (inc. methymercuric phosphate waste) then pumped to large shallow bog north and west of Mutual Fir plant. Bog is assumed to have extended onto property now owned by Chempro.

Sources: Identified in PRP response to 104(e) letter.

Dames & Moore, 1982. Historic Land Use Survey of the Tacoma Tideflats. Prepared for Washington Department of Ecology, Olympia, Washington.

Maps of Tacoma, WA (publishers unknown): 1937, 1941, 1951

Remediation Technologies, Inc. (ReTec), 1987. Site Operations History: Parcel A and Neighboring Parcels, Chemical Processors, Inc., Tacoma, Washington. Privileged and confidential attorney work product. Prepared for Ralph Palumbo, P.S.: Heller, Ehrman, White & McAuliffe Attorneys.

Tetra Tech, 1985. Commencement Bay Nearshore/Tideflats Remedial Investigation, Vol. 2. Prepared for EPA and WDOE.

U.S. EPA, 1985. Potential Hazardous Waste Site Preliminary Assessment, Summary Memorandum: Don Oline Landfill, 1801 Alexander Ave., Tacoma, WA.

Additional PRPs for EPA's PRP List* for property owned/leased by

Cheney Lumber
3701 Taylor Way, Tacoma, WA

HYLEBOS WATERWAY

<u>Name</u>

Probable Status

(b) (6)

Ownership interest, dates unknown

^{*}Source: Identified in PRP response to 104(e) letter.

Additional PRPs for EPA's PRP List* for property owned/leased by

Dunlap Towing Company 2901 Taylor Way/3009 Taylor Way Tacoma, WA

HYLEBOS WATERWAY

Name

Probable Status

West Coast Lumber
Operation Company
(subsidiary of Mitsui Co.)
4215 East West Road
Tacoma, WA 98421

Ownership interest d/b/a West Coast Orient/Portac; leased to Dunlap 1979-1983

Goodwin-Johnson Ltd.
P.O. Box 82217
North Burnaby, B.C. V5C 5P7

Former operator, dates not given

Echo Lumber 5326 184th Street Tacoma, WA 98446 Attn: Harry Proud Former operator, dates not given

Cascade Timber Co. Tacoma, WA 98421

Former operator, dates not given

^{*}Source: Identified in PRP response to 104(e) letter.

Additional PRPs for EPA's PRP List* for property owned/leased by

Fletcher Oil Company 709 Alexander, Tacoma, WA

HYLEBOS WATERWAY

Probable Status Puget Sound Tug & Barge Leased tanks at site in 1979 Tesaro Petroleum Co. Tesaro Drive San Antonio, TX Pacific Resources N.W. Lease/purchase in 1979 Bishop Street

Honolulu, HA

^{*}Source: Identified in PRP response to 104(e) letter.

Additional PRPs for EPA's PRP List* for property owned/leased by

General Metals of Tacoma, Inc. 1902 Marine View Drive, Tacoma, WA

HYLEBOS WATERWAY

Name

Probable Status

Leslie P. Sussman & SRS Properties 1870 Marine View Drive Tacoma, WA

Prior owner and developer of the property.

^{*}Source: Identified in PRP response to 104(a) letter.

Additional PRPs for EPA's PRP List* for property owned/leased by

(b) (6)

3001 Marine View Drive, Tacoma, WA

HYLEBOS WATERWAY

Name

Probable Status

Cascade Custom Covers 3001 Marine View Drive Tacoma, WA (b) (6) company has operated at the site since 1986

^{*}Source: Identified in PRP response to 104(e) letter.

Additional PRPs for EPA's PRP List* for property owned/leased by

Joseph Simon & Sons 1515 Taylor Ave, Tacoma, WA

Name	Probable Status	
Cascade Timber Company	Tenant (1986-present)	
Miller Livestock Company	Tenant (1986-1987)	

^{*}Source: Identified in PRP response to 104(e) letter.

Additional PRPs for EPA's PRP List* for property owned/leased by

Lone Star Industries 3601 Taylor Way, Tacoma, WA

HYLEBOS WATERWAY

Name

Probable Status

Riedel International, d/b/a Pioneer Construction Materials 4455 N. Channel Avenue Portland, OR 97217 Ownership interest (1985-1987)

Glacier Sand & Gravel (subsid. of Kaiser Cement)

Ownership interest (?-1985)

^{*}Source: Identified in PRP response to 104(e) letter.

Additional PRPs for EPA's PRP List* for property owned/leased by

Manke Lumber Company, Inc.
1750 Marine View Dr (owned)
1730 Marine View Dr (leased from Nordlund Properties)
Tacoma, WA

HYLEBOS WATERWAY

Name

Probable Status

Pacific Northwest Terminals, Inc.

Subleased property (1988)

*Source: Identified in PRP response to 104(e) letter.

Additional PRPs for EPA's PRP List* for property owned/leased by

Mintercreek Development

4102 E. 11th/4106 E. 11th/2311 Ross Way Tacoma, WA

HYLEBOS WATERWAY

Name Probable Status Pacific Marine Repair Tenant (1988-present?) Ferguson Manufacturing-Tenant (1987-present?) Trailer Mfg. and Repair; now d/b/a Baldwin Mfg. Rogers Rubber-Roller Tenant (1984-1988) Printer Repair In March 1988, Ecology issued 2810 Meridian East company a field compliance Puyallup, WA 98371 letter for mishandling acetone and toulene Vancouver Home Furnishings Tenant (1984-present) & Waterbed Mfg. a/k/a Port of Tacoma Factory Furniture Inc. 535-1180 Industrial Underwater Tenant (1981-?) Services, Inc. No longer in business 848-9473

Tenant

No longer in business

Samson Boatbuilding

^{*}Source: Identified in PRP response to 104(e) letter.

Additional PRPs for EPA's PRP List* for property owned/leased by

Murray Pacific Corp.
3502 Lincoln Ave
Tacoma, WA

HYLEBOS WATERWAY

Name

Probable Status

Seattle Port Bark Supply 3502 Lincoln Ave Tacoma, WA

Tenant (1985-1988)

ASARCO

Ballast in log-sort yard

^{*}Source: Identified in PRP response to 104(e) letter.

Additional PRPs for EPA's PRP List* for property owned/leased by

Nordlund Properties, Inc. 1622 Marine View Dr Tacoma, WA

Name	Probable Status
Tim Bailey & Associates (sporting good sales)	tenant (1988-present?)
Republic Supply (plumbing supply sales)	Tenant, subleased from Pederson Oil (1983-1986)
Aputco Company (equipment servicing)	Tenant (1983-present)
Harbor Services (repair and overhaul of small marine engines)	Tenant (1980-1983)

^{*}Source: Identified in PRP response to 104(e) letter.

Additional PRPs for EPA's PRP List* for property owned/leased by

Occidental Chemical Corp. 605 Alexander Ave, Tacoma, WA

Name	Probable Status
Hooker Chemical & Plastics Corp.	Ownership interest until 1968
Hooker Chemical Corp./ Hooker Electro-Chemical Company	Ownership interest prior to 1946 and after 1951 until mid- to late-60s

Additional PRPs for EPA's PRP List* for property owned/leased by

Ron & Brad Oline et al. 1940 Marine View Dr, Tacoma, WA

Name	Probable Status
(b) (6)	Tenant (?-present)
PCI Corporation	Tenant (?-present)
Foss Dillingham Corporation	Ownership interest prior to ?
(b) (6)	Tenant under Foss Dillingham Corp.
(b) (6)	Tenant under Foss Dillingham Corp.
(b) (6)	Tenant under Foss Dillingham Corp.

^{*}Source: Identified in PRP response to 104(e) letter.

Additional PRPs for EPA's PRP List* for property owned/leased by

Pacific Resources Northwest, Inc. 709 Alexander Ave, Tacoma, WA

Name	Probable Status
(b) (6)	Ownership interest
All Alaskan Seafood	Ownership interest
Washington Marine Services Inc.	Tenant
United Independent Oil Co.	Tenant
Fausting Marine	Tenant

^{*}Source: Identified in PRP response to 104(e) letter.

Additional PRPs for EPA's PRP List* for property owned/leased by

Petroleum Reclaiming Services, · Inc. 3003 Taylor Way, Tacoma, WA

HYLEBOS WATERWAY

Name	Probable Status
Coastal Tank Cleaning and Coastal Coatings, Inc.	Ownership interest (?-1987)
(b) (6)	Ownership interest (2-1987)

*Source: Identified in PRP response to 104(e) letter.

Additional PRPs for EPA's PRP List* for property owned/leased by

Port of Tacoma

Name	Probable Status
Plum Creek Timber Company, Inc. First Interstate Center Suite 2300 Seattle, WA 98104	Tenant at Parcel 9 (1988-1989)
Cascade Timber Company 2332 E. 11th Street Tacoma, WA 93421	Tenant at Parcel 9 (no dates given)
Wasser & Winters (log storage)	Tenant(?) at Parcel 47 (1972-1984)
Lige Dickson Company	Contracted to prepare 22 acres of Parcel 15 (1975); placed 75,000 tons ASARCO slag at site
Ohio-Ferro Alloys Corporation P.O. Box 8228 Canton, OH 44711	Ownership interest in Parcel 9 (1940-1974)
Pierce County Real Property Management Dept. 9112 Lakewood Drive S.W. Tacoma, WA 98499	Ownership interest (1940s)
PORTAC (log storage) 4215 East-West Road Tacoma, WA 98421	Tenant(?) at Parcel 47 (1966-1972)

^{*}Source: Identified in PRP response to 104(e) letter.

Additional PRPs for EPA's PRP List* for property owned/leased by

Solidus Corporation 1801 Alexander, Tacoma, WA

<u>Name</u>	Probable Status
(b) (6)	Prior ownership interest
Accurate Investments	Prior ownership interest
Linal Cedar Homes	Prior ownership interest
Puget Sound Industrial Petroleum	Prior tenant
Aero Oil Co. of Tacoma	Prior tenant
Petroleum Processors, Inc.	Prior tenant

^{*}Source: Identified in PRP response to 104(e) letter.

Additional PRPs for EPA's PRP List* for property owned/leased by

Sound Refining 2628 Marine View Dr., Tacoma, WA

HYLEBOS WATERWAY

<u>Name</u>

Probable Status

Crysen Corporation from Kalama Chemical Inc.

Ownership interest (?-present)

^{*}Source: Identified in PRP response to 104(e) letter.

Additional PRPs for EPA's PRP List* for property owned/leased by

Superlon Plastics
2116 Taylor Way, Tacoma, WA

HYLEBOS WATERWAY

Name

Probable Status

Justus Company

Ownership interest (?-1972)

^{*}Source: Identified in PRP response to 104(e) letter.

Additional PRPs for EPA's PRP List* for property owned/leased by

Tacoma Boatbuilding Co., Inc. 1840 Marine View Dr., Tacoma, WA

Name	Probable Status
Bay City Marine	Tenant (1988-present)
(b) (6)	Ownership interest (1974- present)
	Ownership interest (1927-1974)

Additional PRPs for EPA's PRP List* for property owned/leased by

USG Interiors/United States Gypsum Co. 2301 Taylor Way, Tacoma, WA

HYLEBOS WATERWAY

Name

Probable Status

Edman Company of Tacoma (log storage and chipping)

Tenant (1985)

^{*}Source: Identified in PRP response to 104(e) letter.

Additional PRPs for EPA's PRP List* for property owned/leased by

Washington Department of Natural Resources

Name	Probable Status
Foss Launch & Tug Company/ Foss Maritime Company (booming)	Tenant at several parcels (1938-present); term of lease to 1998
Department of Highways (waterway crossing)	Tenant (1965-?)
Pacific Telegraph & Telephone Company (submarine cable)	Tenant (1957-?)

Additional PRPs for EPA's PRP List* for property owned/leased by

Western Superior Structurals Manufacturing/Western Engineering 6713 Pacific Highway East, Tacoma, WA

HYLEBOS WATERWAY

Name

Probable Status

(b) (6)

Prior owner

(KIST Bottling Co.)

^{*}Source: Identified in PRP response to 104(e) letter.